

1 REICHELLAW PC
2 MARK J. REICHEL, ATTORNEY AT LAW
3 SBN 155034
4 455 Capitol Mall, Suite 802
5 Sacramento, CA 95814
T: (916) 801-2314
F: (888) 505-9331
mark@reichellaw.com
www.reichellaw

6 Attorney for Defendant
7 ALBERTO NAVARRO ZAPATA

8
9 IN THE UNITED STATES DISTRICT COURT
10
FOR THE EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,) Case No. 23-CR-0162-DAD
12 Plaintiff,)
13 vs.) **STIPULATION TO RE SET STATUS
14 ALBERTO NAVARRO ZAPATA) CONFERENCE; ORDER**
15 Defendant.)

Date: October 6, 2025
Time: 9:30 a.m.
Judge: Hon. DALE A. DROZD

16 **STIPULATION**

17 By previous order, this matter was set for a status conference on August 25, 2025. ECF
18 No. 111. Time has been excluded up until this date. Due to a court scheduling conflict, the
19 matter was subsequently continued to August 28, 2025. ECF No. 122.

20 By stipulation, the parties agree to reset the status conference from the date of August 28,
21 2025, to October 6, 2025, at 9:30 a.m., to exclude time between August 25, 2025, and October 6,
22 2025, with an exclusion of time under Local Code T4.

- 23 1. The parties agree and stipulate, and request that the court find the following:
24 a. Counsel for defendant is unavailable on the original date of August 28, 2025,
25 due to contracting COVID and will not be returning to work until Tuesday,
September 2nd.
b. Defense counsel Reichel is in trial beginning September 8th in Yolo County

1 Superior Court, five days a week, until approximately September 24th.

2 Although the matter is a civil matter, it is four years old and involves an 82-
3 year-old defendant represented by Mr. Reichel. It has priority in the Yolo
4 County system and involves at least 20 witnesses just for the plaintiff who
5 have been subpoenaed and are traveling to attend.

- 6 c. Counsel for the defendant desires additional time to review the discovery with
7 his client, research and investigate possible defenses, discuss any potential
8 resolution with his client, research mitigating evidence, and present it to the
9 prosecution. Defendant is housed at the Nevada County Jail, and defense
10 counsel and the defendant are very close to the adoption of a plea agreement
11 to resolve the matter. A short continuance is needed.
- 12 d. Counsel for defendant believes that failure to grant the above requested
13 continuance would deny him the reasonable time necessary for effective
14 preparation, considering the exercise of due diligence.
- 15 e. The government does not object to the continuance.
- 16 f. Based on the above-mentioned finding, the ends of justice served by
17 continuing the case as requested outweigh the interest of the public and the
18 defendant in a trial within the original date prescribed in the Speedy Trial Act.
- 19 g. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §
20 3161 *et seq.* (Speedy Trial Act), the parties request that the time period
21 between August 25, 2025 and October 6, 2025, inclusive, be deemed
22 excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4),
23 because it would result from a continuance granted by the Court at the
24 defense's request, based on a finding that the ends of justice served by
25 granting the continuance outweighs the best interest of the public and in a
26 speedy trial.
- 27 h. Nothing in the stipulation and order shall preclude the finding that other
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provisions of the Speedy Trial Act dictate the additional time periods are
excludable from the period with which a trial must commence.

IT IS SO STIPULATED.

Date: August 27, 2025

Eric Grant
United States Attorney

/s/ ADRIAN KINSELLA
ADRIAN KINSELLA
Assistant United States Attorney

Date: August 27, 2025

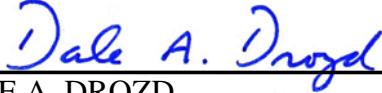
/s/ MARK REICHEL
MARK REICHEL
Attorney for Defendant

1 **FINDINGS AND ORDER**
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3 Pursuant to the stipulation of the parties and good cause appearing, the status conference
4 as to defendant Navarro Zapata previously scheduled for August 28, 2025, is continued to
5 October 6, 2025, at 9:30 a.m., and time is excluded between August 25, 2025, and October 6,
6 2025, with an exclusion of time under Local Code T4.

7 IT IS SO ORDERED.
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9 Dated: August 27, 2025



DALE A. DROZD
UNITED STATES DISTRICT JUDGE

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